

March 23, 2025

VIA ECF

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

Ms. Javice requests that the Court admit GX 1389 (an email from Ryan MacDonald to Leslie Wims Morris and others on JPMorgan Chase Bank, N.A.'s ("JPMC") Frank integration team) and CJ 1730 (an email from Jennifer Roberts to Mr. MacDonald and others). The authenticity of these documents is not disputed, but counsel for Ms. Javice was prevented from questioning Mr. MacDonald about these and similar documents because the Court has systematically precluded Ms. Javice from eliciting testimony and offering documents related to the post-acquisition integration and ultimate shutdown of Frank by JPMC. *See, e.g.*, Tr. 2467:17–2469:23 (including the Court's admonishment that counsel discontinue its inquiry into post-acquisition events, or the Court would terminate the cross-examination entirely); Tr. 2472:10–20; Tr. 2480:17–25. Ms. Javice has consistently sought to introduce this evidence to defend against the Government's charges related to alleged post-acquisition conduct, including to show that JPMC was motivated to fabricate a fraud to lay blame for Frank's failed integration at Ms. Javice's feet, when it was JPMC's failure to provide Frank with the resources it required that gutted the company she had built. *See* Dkts. 312, 312-1, 317, and 333. This evidence is relevant to the bias of JPMC's witnesses and to defending against other post-acquisition testimony the Government has been permitted to elicit, and the Court's refusal to allow Ms. Javice to offer evidence in her defense is a violation of her Fifth and Sixth Amendment rights.

For the foregoing reasons, and in the interest of fairness, Ms. Javice requests the Court admit GX 1389 and CJ 1730.

Respectfully submitted,

/s/ Sara C. Clark

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cc: All Counsel of Record